

United States District Court
Southern District of Texas
FILED

APR 25 2017

David J. Bradley, Clerk

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
McALLEN DIVISION

UNITED STATES OF AMERICA

v.

RAUL MARIO RODRIGUEZ, JR.
JUAN PEREZ-ALCOSER
JOSE NAPOLEON RODRIGUEZ
NAPOLEON
MAPOLEON (jl)§
§
§
§
§
§

Criminal No. M-16-0804-S2

SECOND SEALED SUPERSEINDG INDICTMENT

THE GRAND JURY CHARGES:

Count One

From on or about May 2, 2016, to on or about May 6, 2016, in the Southern District of Texas and within the jurisdiction of the Court, defendant,

RAUL MARIO RODRIGUEZ, JR.

knowing and in reckless disregard of the fact that individuals, who were aliens, had come to, entered and remained in the United States in violation of law, did knowingly and intentionally conspire and agree with other persons known and unknown to the Grand Jurors to conceal, harbor, and shield from detection said aliens in any place, including any building or any means of transportation, to wit: in a residence located near Mission, Texas.

In violation of Title 8, United States Code, Sections 1324(a)(1)(A)(v)(I), 1324(a)(1)(A)(iii), and 1324(a)(1)(B)(i).

Count Two

From on or about May 2, 2016, to on or about May 6, 2016, in the Southern District of Texas and within the jurisdiction of the Court, defendant,

RAUL MARIO RODRIGUEZ, JR.

knowing and in reckless disregard of the fact that Oliver Santamaria-Rendon was an alien who had come to, entered, and remained in the United States in violation of law, did knowingly conceal, harbor, and shield from detection and attempt to conceal, harbor, and shield from detection said alien in any place, including any building or any means of transportation, to wit: in a residence located near Mission, Texas, for the purpose of commercial advantage and private financial gain.

In violation of Title 8, United States Code, Sections 1324(a)(1)(A)(iii), 1324(a)(1)(A)(v)(II), and 1324(a)(1)(B)(i).

Count Three

From on or about May 2, 2016, to on or about May 6, 2016, in the Southern District of Texas and within the jurisdiction of the Court, defendant,

RAUL MARIO RODRIGUEZ, JR.

knowing and in reckless disregard of the fact that Wendy Elizabeth Perez-Perez was an alien who had come to, entered, and remained in the United States in violation of law, did knowingly conceal, harbor, and shield from detection and attempt to conceal, harbor, and shield from detection said alien in any place, including any building or any means of transportation, to wit: in a residence located near Mission, Texas, for the purpose of commercial advantage and private financial gain.

In violation of Title 8, United States Code, Sections 1324(a)(1)(A)(iii), 1324(a)(1)(A)(v)(II), and 1324(a)(1)(B)(i).

Count Four

From on or about May 2, 2016, to on or about May 6, 2016, in the Southern District of Texas and within the jurisdiction of the Court, defendant,

RAUL MARIO RODRIGUEZ, JR.

knowing and in reckless disregard of the fact that Hilda Irene Perez-Reyes was an alien who had come to, entered, and remained in the United States in violation of law, did knowingly conceal, harbor, and shield from detection and attempt to conceal, harbor, and shield from detection said alien in any place, including any building or any means of transportation, to wit: in a residence located near Mission, Texas, for the purpose of commercial advantage and private financial gain.

In violation of Title 8, United States Code, Sections 1324(a)(1)(A)(iii), 1324(a)(1)(A)(v)(II), and 1324(a)(1)(B)(i).

Count Five

From on or about May 2, 2016, to on or about May 6, 2016, in the Southern District of Texas and within the jurisdiction of the Court, defendant,

RAUL MARIO RODRIGUEZ, JR.

knowing and in reckless disregard of the fact that individuals, who were aliens, had come to, entered and remained in the United States in violation of law, did knowingly and intentionally conspire and agree with other persons known and unknown to the Grand Jurors to transport and move said aliens within the United States in furtherance of such violation of law, that is, from a location near Mission, Texas, to another location near Mission, Texas, by means of a motor vehicle.

In violation of Title 8, United States Code, Sections 1324(a)(1)(A)(v)(I), 1324(a)(1)(A)(ii), and 1324(a)(1)(B)(i).

Count Six

From on or about May 6, 2016, to on or about May 12, 2016, in the Southern District of Texas and within the jurisdiction of the Court, defendants,

JUAN PEREZ-ALCOSER
and
JOSE NAPOLEON RODRIGUEZ

knowing and in reckless disregard of the fact that individuals, who were aliens, had come to, entered and remained in the United States in violation of law, did knowingly and intentionally conspire and agree together and with other persons known and unknown to the Grand Jurors to conceal, harbor, and shield from detection said aliens in any place, including any building or any means of transportation, to wit: in a residence located near Mission, Texas.

In violation of Title 8, United States Code, Sections 1324(a)(1)(A)(v)(I), 1324(a)(1)(A)(iii), and 1324(a)(1)(B)(i).

Count Seven

From on or about May 6, 2016, to on or about May 9, 2016, in the Southern District of Texas and within the jurisdiction of the Court, defendants,

JUAN PEREZ-ALCOSER
and
JOSE NAPOLEON RODRIGUEZ
MAPOLEON (jl)

knowing and in reckless disregard of the fact that Oliver Santamaria-Rendon was an alien who had come to, entered, and remained in the United States in violation of law, did knowingly conceal, harbor, and shield from detection and attempt to conceal, harbor, and shield from detection said alien in any place, including any building or any means of transportation, to wit: in a residence located near Mission, Texas, for the purpose of commercial advantage and private financial gain.

In violation of Title 8, United States Code, Sections 1324(a)(1)(A)(iii), 1324(a)(1)(A)(v)(II), and 1324(a)(1)(B)(i).

Count Eight

From on or about May 6, 2016, to on or about May 12, 2016, in the Southern District of Texas and within the jurisdiction of the Court, defendants,

JUAN PEREZ-ALCOSER
and
JOSE ~~MAPOLEON~~ RODRIGUEZ
MAPOLEON (jl)

knowing and in reckless disregard of the fact that Wendy Elizabeth Perez-Perez was an alien who had come to, entered, and remained in the United States in violation of law, did knowingly conceal, harbor, and shield from detection and attempt to conceal, harbor, and shield from detection said alien in any place, including any building or any means of transportation, to wit: in a residence located near Mission, Texas, for the purpose of commercial advantage and private financial gain.

In violation of Title 8, United States Code, Sections 1324(a)(1)(A)(iii), 1324(a)(1)(A)(v)(II), and 1324(a)(1)(B)(i).

Count Nine

From on or about May 6, 2016, to on or about May 12, 2016, in the Southern District of Texas and within the jurisdiction of the Court, defendants,

JUAN PEREZ-ALCOSER
and
JOSE ~~MAPOLEON~~ RODRIGUEZ
MAPOLEON (jl)

knowing and in reckless disregard of the fact that Hilda Irene Perez-Reyes was an alien who had come to, entered, and remained in the United States in violation of law, did knowingly conceal, harbor, and shield from detection and attempt to conceal, harbor, and shield from detection said alien in any place, including any building or any means of transportation, to wit: in a residence located near Mission, Texas, for the purpose of commercial advantage and private financial gain.

In violation of Title 8, United States Code, Sections 1324(a)(1)(A)(iii), 1324(a)(1)(A)(v)(II), and 1324(a)(1)(B)(i).

Count Ten

From on or about May 2, 2016, to on or about May 6, 2016, in the Southern District of Texas and within the jurisdiction of the Court, defendant,

RAUL MARIO RODRIGUEZ, JR.

did knowingly and intentionally conspire and agree with other person and persons known and unknown to the Grand Jurors, to seize and detain and threaten to kill, injure, or continue to detain another person in order to compel a third person to pay money as an explicit or implicit condition for the release of the person detained.

In violation of Title 18, United States Code, Section 1203(a).

Count Eleven

From on or about May 2, 2016, to on or about May 6, 2016, in the Southern District of Texas and within the jurisdiction of the Court, defendant,

RAUL MARIO RODRIGUEZ, JR.

did knowingly and intentionally seize and detain and threaten to kill, injure, and continue to detain Oliver Santamaria-Rendon in order to compel Rafael Rodriguez-Rendon to pay money as an explicit or implicit condition for the release of Oliver Santamaria-Rendon.

In violation of Title 18, United States Code, Section 1203 and 2.

Count Twelve

From on or about May 2, 2016, to on or about May 6, 2016, in the Southern District of Texas and within the jurisdiction of the Court, defendant,

RAUL MARIO RODRIGUEZ, JR.

did knowingly and intentionally seize and detain and threaten to kill, injure, and continue to detain Wendy Elizabeth Perez-Perez in order to compel Jairo Muralles and Miguel Angel Perez-Aguilar to pay money as an explicit or implicit condition for the release of Wendy Elizabeth Perez-Perez.

In violation of Title 18, United States Code, Section 1203 and 2.

Count Thirteen

From on or about May 2, 2016, to on or about May 6, 2016, in the Southern District of Texas and within the jurisdiction of the Court, defendant,

RAUL MARIO RODRIGUEZ, JR.

did knowingly and intentionally seize and detain and threaten to kill, injure, and continue to detain Hilda Irene Perez-Reyes in order to compel Rigoberto Perez-Reyes and Leodan Muralles-Perez to pay money as an explicit or implicit condition for the release of Hilda Irene Perez-Reyes.

In violation of Title 18, United States Code, Section 1203 and 2.

Count Fourteen

From on or about May 6, 2016, to on or about May 12, 2016, in the Southern District of Texas and within the jurisdiction of the Court, defendants,

**JUAN PEREZ-ALCOSER
and
JOSE ~~XXXXXXXX~~ RODRIGUEZ
MAPOLEON (jl)**

did knowingly and intentionally conspire and agree together and with other person and persons known and unknown to the Grand Jurors, to seize and detain and threaten to kill, injure, or continue to detain another person in order to compel a third person to pay money as an explicit or implicit condition for the release of the person detained.

In violation of Title 18, United States Code, Section 1203(a).

Count Fifteen

From on or about May 6, 2016, to on or about May 9, 2016, in the Southern District of Texas and within the jurisdiction of the Court, defendants,

JUAN PEREZ-ALCOSER
and
JOSE ~~MAPOLEON~~ RODRIGUEZ
MAPOLEON (jl)

did knowingly and intentionally seize and detain and threaten to kill, injure, and continue to detain Oliver Santamaria-Rendon in order to compel Rafael Perez-Rendon to pay money as an explicit or implicit condition for the release of Oliver Santamaria-Rendon.

In violation of Title 18, United States Code, Section 1203 and 2.

Count Sixteen

From on or about May 6, 2016, to on or about May 12, 2016, in the Southern District of Texas and within the jurisdiction of the Court, defendants,

JUAN PEREZ-ALCOSER
and
JOSE ~~MAPOLEON~~ RODRIGUEZ
MAPOLEON (jl)

did knowingly and intentionally seize and detain and threaten to kill, injure, and continue to detain Wendy Elizabeth Perez-Perez in order to compel Jairo Muralles and Miguel Angel Perez-Aguilar to pay money as an explicit or implicit condition for the release of Wendy Elizabeth Perez-Perez.

In violation of Title 18, United States Code, Section 1203 and 2.

Count Seventeen

From on or about May 6, 2016, to on or about May 12, 2016, in the Southern District of Texas and within the jurisdiction of the Court, defendants,

JUAN PEREZ-ALCOSER
and
JOSE ~~MAPOLEON~~ RODRIGUEZ
MAPOLEON (jl)

did knowingly and intentionally seize and detain and threaten to kill, injure, and continue to detain Hilda Irene Perez-Reyes in order to compel Rigoberto Perez-Reyes and Leodan Muralles-Perez to pay money as an explicit or implicit condition for the release of Hilda Irene Perez-Reyes.

In violation of Title 18, United States Code, Section 1203 and 2.

A TRUE BILL

FOREPERSON

ABE MARTINEZ
ACTING UNITED STATES ATTORNEY

ASSISTANT UNITED STATES ATTORNEY